

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

**IN RE: REAGOR-DYKES MOTORS,
LP ET AL.,
*Debtor.***

§ **Case No. 18-50214-RLJ-11
Chapter 11**

**DENNIS FAULKNER, TRUSTEE OF
REAGOR-DYKES AUTO GROUP
CREDITORS LIQUIDATING TRUST,
*Plaintiff,***

§ **Adversary Proc. No. 20-05039-RLJ**

v.

**AIMBANK,
*Defendant.***

§

DECLARATION OF DEBBIE SMITH

My name is Debbie Smith. I have never been convicted of a felony or a crime of moral turpitude. I am in all ways competent to make this declaration. Pursuant to 28 U.S.C. § 1746, I declare as follows:

1. I am currently employed as a Branch Manager for First Bank & Trust, formerly known as AimBank. The facts set forth in this declaration are based on my personal knowledge and true and correct.
2. My deposition was taken in this matter on November 2, 2021.
3. As I testified in my deposition, I believed that AimBank's documents from before its merger with First Bank & Trust had been placed in what is known as the "W: drive." I believed this would include a "Wayne Barnett" subfolder, which is where I believed 2017 and 2018 kite reports relating to Reagor-Dykes would be located.

EXHIBIT
A

4. At the time of my deposition, I had not actually checked the W: drive to see if the Wayne Barnett subfolder or kiting reports were actually there.

5. Subsequent to my deposition, I looked to see if the above-referenced folders or kite reports were, in fact, located in the W: drive. They were not there. I did not know where else the 2017 - 2018 kite reports relating to Reagor-Dykes would be, or if they still existed at all.

6. I now understand that some kite reports have been located somewhere other than the W: drive.

[Remainder intentionally left blank]

I, Debbie Smith, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the above and foregoing is true and correct.

Signed on this, the 7th day of March 2022.



A handwritten signature in blue ink, appearing to read "Debbie Smith". The signature is fluid and cursive, with a horizontal line underneath it.

Debbie Smith